STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT Case Type: Contract

City of Long Lake,

Court File No. 27-CV-23-9758 The Hon. Laurie J. Miller

Plaintiff,

vs.

City of Orono,

Defendant.

DECLARATION OF JAMES B. SEALS

- I, **JAMES B. SEALS**, declare under penalty of perjury per Minn. Stat. § 358.116 that the following is true and correct:
 - 1. I have personal knowledge of the facts set forth below.
- 2. I recently became a resident of Minnetrista. Prior to moving, I was a resident of Orono for approximately 12 years.
- 3. I am a firefighter with the Long Lake Fire Department ("LLFD") and have served the community for approximately five years.
- 4. I was never directly approached by anyone at Orono to apply to the Fire Department. I had always planned to do so. To my knowledge, the idea of Orono starting their own fire department has been well known and discussed by LLFD and Long Lake for approximately five years. It was always my intention to join the Orono Fire Department once it was established because I want to continue to serve my

community. This was a decision I made close to two years ago. To my knowledge, every LLFD firefighter who has been hired at Orono decided they would apply prior to this pending lawsuit.

- 5. I applied to the Orono Fire Department on July 24, 2023.
- 6. I believe I have the right to choose where I work.
- 7. Orono hired me on October 9, 2023. I understand it was originally planned for me to be hired on August 28, 2023, but that was delayed with mediation set for the following month.
- 8. I received a text from Chief Van Eyll concerning the open house on September 20, 2023. I had already decided to accept employment with the Orono Fire Department prior to receiving this text and it played no role in my decision-making process.
- 9. I plan to continue to work for the LLFD, provided there is a welcoming work environment. I believe I have the right to leave a place of work at my choosing.
- 10. Based on my decision to work for the Orono Fire Department, I have heard off-hand comments about Orono's bad leadership.

FURTHER THIS DECLARANT SAYETH NOT.

Dated: October 25, 2023	s/James B. Seals
	James B. Seals

I declare under penalty of perjury, per Minn. Stat. § 358.116, that everything that I have stated in this document is true and correct.

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STATE OF MINNESOTA ) :ss. COUNTY OF HENNEPIN )
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